



Maryland Department of Planning

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Deputy Secretary

July 17, 2007

Honorable Robert E. Bruchey II
Mayor of Hagerstown
City Hall
1 East Franklin Street
Hagerstown, Maryland 21740-4817

Dear Mayor Bruchey:

The Maryland Department of Planning has completed the coordinated review of the Draft Comprehensive Plan for the City of Hagerstown. Thank you for your participation in the plan review process. The State of Maryland is committed to fighting the high financial, social, and environmental costs of sprawl development through effective Smart Growth and Neighborhood Conservation strategies.

After review of the Draft Plan it appears that it has been developed with Smart Growth in mind. The City has done a commendable job creating a Plan that understands and accommodates for the unique nature of the City of Hagerstown. We are encouraged to see objectives that will encourage infill development and revitalization in the older retail centers throughout the City. This is necessary in maintaining a steady economy and protecting the City's residential neighborhoods.

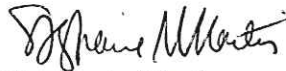
While the Plan makes excellent progress toward meeting many of the requirements of HB1141, it does not yet fully meet those requirements including the mandated review of the Water Resources Element by the Maryland Department of the Environment and the Sensitive Areas Element by both MDE and DNR. We look forward to further revisions of this Plan to fully address the new Water Resources, Municipal Growth, and Sensitive Areas requirements of HB 1141.

It is good planning practice throughout the State of Maryland that within six months of adoption a new Comprehensive Plan, the Zoning and Subdivision Ordinances be updated. The Maryland Department of Planning would like to remain involved and updated on that process as it moves forward.

The following pages contain comments and recommendations from the Maryland Department of Planning. Also, included are reviews by the Maryland Historic Trust and the Maryland Department of Transportation.

Thank you again for the opportunity to review the City of Hagerstown Draft Plan. If you have any questions and/or require assistance, please contact the review coordinator David V. Cotton at 301-777-2161.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stephanie Martins', with a stylized, cursive script.

Stephanie Martins
Director, Land Use Planning and Analysis

cc: Dave Cotton, MDP
Kathleen Maher, Planning Director

Review Comments from the Maryland Department of Planning
2007 Comprehensive Plan
City of Hagerstown, Maryland

DRAFT
May 2007

During the 2006 legislative session House Bill 1141 was passed requiring Counties and Municipalities address several new elements within their Comprehensive Plans. Under the provisions of this law all new elements will need to be included into comprehensive plans by October 1, 2009. Guidance documents for the Municipal Growth Element and the Water Resources Element are available at the Maryland Department of Planning website (<http://www.mdp.state.md.us/>).

It is unclear from the draft plan if the City intends for this plan to meet all of the requirements of the Municipal Growth Element and Water Resources Elements. MDP has reviewed the plan for compliance and offers the following comments.

MUNICIPAL GROWTH ELEMENT

GROWTH CAPACITY/BUILD OUT ANALYSIS

We commend the City on its incorporation of a build out analysis in the draft plan. The City has also done a good job of establishing a range of population projections and identifying future growth areas, pipeline development and vacant and under-utilized lands. However, it would be helpful if the actual acres and capacity for each were listed in Table GM-2 and a more specific timeframe for each annexation were provided.

Additionally, the link between the population projections (demand) and development capacity (supply) should be discussed within the plan.

In the context of planning for development, it is important to strive for a balance between land supply and demand for future growth.

- Provide too little land for development (be it on greenfields, redevelopment, or infill), and the land cost will become too high or development may spill over to adjacent jurisdictions.
- Provide too much land for development and it will tend to be used inefficiently. In addition, plans and growth controls will be marginalized because there are an abundance of locational options for each new development.

POPULATION GROWTH

The Census Bureau estimates that the population of the City has increased by 1,700 persons between 2000 and 2005. Based on dwelling units currently under construction and pipeline

development, the draft plan estimates an increase of 6,400 residents between 2006 and 2011 (GM-4). This would represent a significant increase in population from past trends. It would be helpful if the plan provide context for this amount of growth. What are the driving forces behind this amount of growth? What is happening in the Region?

PRIORITY FUNDING AREAS/ANNEXATION

The plan states that the City intends on annexing areas of the UGA "to guide growth to make the most efficient use of the infrastructure and services." (GM-8) It should be noted that if the City intends on certifying these areas as (PFAs) they will be subject to a supply and demand test as part of the certification process. This test is now required as part of legislation passed by the General Assembly in 2006. For more information see MDP's website (<http://www.mdp.state.md.us/hb1141.htm>).

INFRASTRUCTURE

HB 1141 requires the Municipal Growth Element examine the relationship between infrastructure supply and future demand. This includes: public school capacity, library services, police, fire, water and sewer facilities, stormwater management systems and recreation facilities. The draft plan only partially specifies the impacts of proposed development on these facilities.

The plan does look at the impact of growth on water/sewerage treatment capacity and makes some general statements about needed long-term expansions of police facilities. The plan also provides maps showing proposed fire stations and future parks, however there is little discussion in the text about these needs. Instead of determining impacts, the draft refers to the need to write plans to address impacts on parks and emergency services.

The discussion on schools covers facility expansions planned through 2012, but these appear to be already programmed by the County and do not take into account the substantial growth that would supposedly take place in Hagerstown over the life of this plan.

FINANCING MECHANISMS

The plan should identify possible mechanisms to finance infrastructure improvements required by future growth. It does not appear that the draft Plan meets this requirement.

WATER RESOURCE ELEMENT

WATER AND SEWERAGE

The City of Hagerstown Draft Comprehensive Plan presents a very detailed description of its water and sewer issues and provides reasonable implementation policies to address those issues. The Water and Sewer Policies (WS-14) establish tiered priority areas for new or expanded sewer service that are supportive of the Plan's land use element and State Planning policies. The Plan provides for an orderly expansion for development by first strengthening

the core of the municipality by supporting infill and redevelopment and second by expanding facility into the Medium-Range Growth Area.

The Plan provides a close relationship between land use policies and water and sewer planning. It identifies a growth area within which water and sewerage is to be provided. The provision for the extension of water and sewer services outside of the municipal boundary is addressed by an annexation policy. Also, the Plan proposes actions that strengthen coordination between the City and the County to ensure that new development is timed to match the availability of water and sewer service.

WATER AND SEWER IMPLEMENTATION ACTION (page WS-17)

We recommend that the County investigate and consider policies that will lower anticipated demand. Examples of these policies can be found in ***The Water Resources Element: Planning for Water Supply and Wastewater and Stormwater Management***. This publication is the latest in the Model and Guideline series Managing Maryland's Growth.

HOUSING ELEMENT

House Bill 1160 established a Workforce Housing Grant Program. To be eligible for monies from this grant the City is required to include a Work Force Housing Element in the Comprehensive Plan. A Workforce Housing Element of the Comprehensive Plan should include:

- Preservation or renovation of existing housing stock;
- Redevelopment of existing residential areas;
- Streamlined regulatory process;
- Reduced regulatory fees for construction or renovation and leveraging of Federal financial assistance;
- Financial incentives for construction and renovation;
- Special zoning regulations including inclusionary zoning;
- Efforts to preserve workforce housing stock for subsequent program participants; and,
- Coordination with neighboring jurisdictions and private sector employers.

MISCELLANEOUS

- The horizon year of the draft plan changes throughout, some figures are reported for 2026 and others for 2027. Table IN-4 on page IN-9, reports the projected population for the City in 2026, development capacity is then reported for 2027 on page GM-8. It would be helpful if only one horizon year were used.
- Page IN6- IN8 report historic and projected population for the County, City and Hagerstown fringe. The purpose of reporting these figures for the Hagerstown fringe is not exactly clear it does not appear to follow the future growth boundary for the City of Hagerstown. The inclusion of the fringe area in the draft plan sometimes creates

confusion when deciphering between the various levels of geography reported (County, City, Fringe, Growth Boundary...).

- Table IN-3 on page IN-8 has the projected 2030 population for Washington County as 89,800, The Maryland Department of Planning (MDP) is referenced as the source of these data. According to MDP's September 2006 population projections, *available at http://www.mdp.state.md.us/msdc/dw_poppoj.htm*, Washington County is projected to reach 189,950 by 2030. This population figure should also be corrected on page GM-5.